

Defendant.

1:10-cv-02658-JOF

3. In my experience, a billing rate of \$495.00 per hour for a partner with

ten years of employment-law-related experience, primarily in wage-hour litigation, is well within the range of rates for firms of the size, type, and caliber of Seyfarth Shaw LLP in the Atlanta area for wage-hour litigation.

4. In my experience, a billing rate of \$275.00 per hour for a wage-hour litigation associate with approximately four years of experience is well within the range of rates charged to paying clients by firms of the size, type, and caliber of Seyfarth Shaw LLP in the Atlanta area for wage-hour litigation.

5. Based on my review and experience, Seyfarth Shaw LLP's attorneys exercised good billing judgment for the time they charged Crawford & Company to plan, prepare, revise, and file an opposition to Plaintiff LaMonte's motion to compel, including as well their time preparing the ensuing motion for Crawford's reasonable expenses in opposing that motion. The amount of time spent is reasonable and within the time attorneys with similar experience in employment-related litigation would be expected to expend, given various considerations including, but not limited to, the importance of the issues, the complexity of the arguments, the volume of the supporting evidence, and the results obtained.

6. In my experience, attorneys from Seyfarth Shaw LLP, including Brett C. Bartlett whom I know personally, have a good reputation and are of sound experience, especially in litigating employment-related matters.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 22nd day of August, 2011.



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Angelo Spinola